

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
CIVIL DIVISION - LAW

JAMES NACE and APRIL NACE, as : NO. 15-0333
Guardians of E.N., a minor, :
:
Plaintiffs :
:
vs. :
:
ERIC ROMIG, PENNRIDGE SCHOOL :
DISTRICT, DR. THOMAS CREEDEN and:
DAVID BABB, :
:
and :
:
FAITH CHRISTIAN ACADEMY, RYAN :
CLYMER, RUSSELL HOLLENBACH, :
:
Defendants :

DEPOSITION OF JAMES EDWARD NACE

Taken in the law offices of
Drake, Hileman and Davis, 252 West Swamp Road, Suite 15,
Doylestown, Pennsylvania, on Friday, October 16, 2015,
commencing at 1:00 p.m., by Stacy D. Serba, Notary Public.

* * *

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JAMES EDWARD NACE

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-- For Pennridge School District

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-- For Faith Christian Academy

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JAMES EDWARD NACE

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APPEARANCES: (Continued)

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-- For Faith Christian Academy

Ryan Clymer

Russell Hollenbach

ALSO PRESENT: April Nace

JAMES EDWARD NACE

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JAMES EDWARD NACE

7 JAMES EDWARD NACE, having been
8 duly sworn, was examined and testified as follows:

* * *

EXAMINATION

11 BY MR. KEMETHER:

12 Q. Good afternoon, sir, my name is Sean
13 Kemether. I represent Ryan Clymer and Russ
14 Hollenbach in a litigation that you and your family
15 have brought relating to your daughter.

16 We're here today to take your deposition.
17 I don't know if you've have been through a process
18 like this, but let me give you some instructions that
19 should make the process easier for you and for us.

20 The oath you just took is essentially the
21 oath you would take if we were down in the courthouse
22 before a judge and jury, so even though we're sitting
23 in a lawyer's office, you're about to give sworn
24 court testimony.

Once you answer a question, it will be

JAMES EDWARD NACE

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1 assumed you understood the question. Is that fair?

2 A. Yes.

3 Q. Okay. Try to remember to use words in
4 answering my question. It sounds obvious, but in
5 day-to-day life people communicate in ways other than
6 words. For instance, they shake their head, they
7 shrug their shoulders and they say uh-huh or huh-uh.
8 You can do all those things, but in addition to that,
9 you have to say the words because the court reporter
10 who is taking down everything that's being said can
11 only take down words. All right?

12 Try to wait for me to finish my question
13 before you answer and I'll try to give you the same
14 courtesy, for the same reason, for the court
15 reporter's benefit, it's important that only one of
16 us speaks at a time.

17 I may ask you questions involving --
18 strike that. Let me put it this way.

19 If you don't know the answer to a
20 question or you don't remember something, tell me
21 that. I don't want you to guess at anything. I
22 might ask you some questions involving measurements
23 and things like time or distance. And if I ask those
24 questions, I'd ask you to at least try to give an
25 estimate. An estimate isn't a guess, but it's a

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1 range or an approximation, though not an exact
2 figure. For instance, if I asked how far are you
3 sitting from me right now, we would need a tape
4 measure to figure out the exact figure. But you'd
5 probably be comfortable saying, we're sitting about
6 five feet from each other. That's an estimate. If
7 you can do that, great. If you're just pulling
8 numbers out of the sky, I don't want you to do that.
9 Okay?

10 If you need to take a break for any
11 reason, including to speak to counsel, let me know,
12 we'll make arrangements for that. I just ask that
13 you not do it in the middle of answering a question.
14 Just answer the question and then take a break.

15 Okay?

16 A. Okay.

17 Q. All right. A little bit about your
18 background. What's your date of birth?

19 A. 6/4/62.

20 Q. And off the record. What's your Social
21 Security number?

22 MR. GROTH: I'm going to object to
23 that and instruct him not to answer.

24 MR. KEMETHER: We can put that on
25 the record.

JAMES EDWARD NACE

1 There was a question that asked about
2 Social Security number and the witness was instructed
3 not to answer.

4 BY MR. KEMETHER:

5 Q. Back on the record. Sir, do you have a job?

6 A. Yes.

7 Q. What do you do for a living?

8 A. I'm a machinist.

9 Q. A machinist. Who do you work for?

10 A. Greene, Tweed and Company.

11 Q. About how long have you worked for them?

12 A. Thirty-four years.

13 Q. Do you -- talk about your formal education.

14 What's the highest level of formal education that you
15 have had?

16 A. Twelfth grade high school.

17 Q. You graduate?

18 A. Yes.

19 Q. Where and when?

20 A. Perkiomen Valley, 1980.

21 Q. All right. And I take it you're married?

22 A. Yes.

23 Q. And how long have you been married?

24 A. Twenty-five years and two weeks.

25 Q. Congratulations.

JAMES EDWARD NACE

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1 How many children do you have?

2 A. Two.

3 Q. And their names?

4 A. Amanda and Elizabeth.

5 Q. How old is Amanda?

6 A. She'll be 27 in December.

7 Q. Okay. And we've taken Elizabeth's
8 deposition, so we know her details.

9 Talk a little bit about, what are you
10 comfortable having me refer to your daughter? What
11 name would you like me to use?

12 A. Liz is fine.

13 Q. Going to talk about Liz's education from
14 high school forward. Did she go to the same high
15 school all four years?

16 A. Yes.

17 Q. All right. And that was which school?

18 A. Pennridge.

19 Q. All right. The issues that we're talking
20 about here that are the subject of this lawsuit were
21 roughly either between the junior and senior year and
22 during the junior year of high school?

23 A. I don't understand the question.

24 Q. All right. We're here because of the
25 lawsuit that you and your wife have filed and your

JAMES EDWARD NACE

10

1 daughter have filed pertaining to issues of improper
2 conduct by Eric Romig.

3 A. Yes.

4 Q. To your knowledge, those issues occurred
5 during the end of junior year and the summer of
6 junior year -- between junior and senior year?

7 A. No.

8 Q. No. What time frame during Liz's high
9 school were they?

10 A. Sophomore year, after sophomore year.

11 Q. After sophomore year. Okay. What year did
12 she graduate from high school?

13 A. 2014. I'm sorry, 2015. This year.

14 Q. All right. During her freshman year of high
15 school, were there any problems that you're aware of
16 in terms of Liz at Pennridge in terms of either
17 problems in the school itself, behavioral problems,
18 anything like that, emotional problems?

19 A. No.

20 Q. During the sophomore year of high school,
21 same question.

22 A. No.

23 Q. When did you first become aware of a person
24 by the name of Eric Romig?

25 A. I don't recall.

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11

1 Q. Do you remember how you became aware of his
2 existence?

3 A. He was her softball coach for high school.

4 Q. I just want to speak in detail, to your
5 knowledge, where and when was he coaching her. So
6 was that during her freshman year?

7 MR. GROTH: Just so we're on the
8 same page, when you're saying freshman, sophomore,
9 you're talking 9th, 10th, 11th grade?

10 MR. KEMETHER: Yes.

11 MR. GROTH: Maybe it's easier to do
12 it --

13 MR. KEMETHER: Okay.

14 BY MR. KEMETHER:

15 Q. Was that during 9th grade?

16 A. Yes.

17 Q. And the season for softball, was that the
18 spring, the fall, the winter, all of the above?

19 A. It's in the spring.

20 Q. Okay. Did you meet him, Mr. Romig, during
21 her 9th grade year when she was on the softball team?

22 A. Yes.

23 Q. About how many times, if you know?

24 A. Once or twice.

25 Q. Any issues during your meetings with him

JAMES EDWARD NACE

12

1 that were anything out of the usual?

2 A. No.

3 Q. Did you become aware during her 9th grade
4 year that -- of any allegations against him that he
5 was acting in any improper way either towards your
6 daughter or towards anyone else?

7 A. No.

8 Q. Was there any softball over the summer
9 between 9th and 10th grade that your daughter was
10 involved in?

11 A. Yes.

12 Q. What would that have been?

13 A. It would have been for Deep Run.

14 Q. Deep Run?

15 A. Yes.

16 Q. To your knowledge, was Eric Romig involved
17 in that program?

18 A. No.

19 Q. During the 10th year, school year, were
20 there any interactions with Eric Romig? In other
21 words, was he her coach again for the softball team
22 in the 10th grade, as well?

23 A. Yes.

24 Q. And that would have started in the spring?

25 A. Yes.

JAMES EDWARD NACE

13

1 Q. Did you deal with him during that school
2 year? Meet with him, talk to him, anything like
3 that?

4 A. Yes.

5 Q. Anything unusual about those occasions?

6 A. No.

7 Q. During Liz's 10th grade school year, did you
8 become aware of anything unusual about Eric Romig
9 either involving Liz or involving anybody else?

10 A. No.

11 Q. During the summer between her sophomore and
12 junior year, or I should say 10th grade and 11th
13 grade, did she participate in any softball teams?

14 A. Yes.

15 Q. What was the name of that team or those
16 teams?

17 A. I believe that's when she started for the
18 Belles.

19 Q. That would be the Sellersville Belles?

20 A. Yes.

21 Q. And was, to your knowledge, Eric Romig
22 involved in coaching that team?

23 A. Yes.

24 Q. Did you deal with him in the context of
25 being a coach of the Sellersville Belles? Did you

JAMES EDWARD NACE

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1 have interactions with him during that summer?

2 A. No, not really.

3 Q. Did anything unusual come to your attention
4 about Eric Romig during that summer where he was
5 coaching your daughter for Sellersville Belles
6 between 10th and 11th grade?

7 A. No.

8 Q. Did your daughter play softball for
9 Pennridge in 11th grade?

10 A. Yes.

11 Q. And was Eric Romig the coach on that team in
12 11th grade?

13 A. No.

14 Q. Did you have any dealings with Eric Romig
15 during your daughter's 11th grade?

16 A. No.

17 Q. Do you have an understanding of what
18 happened to him in 11th grade that he wasn't coaching
19 with Pennridge that year?

20 A. Yes.

21 Q. What's your understanding of that?

22 A. He was arrested.

23 Q. When do you understand that he was arrested?

24 A. September -- October 1st, 2013.

25 Q. Okay. And what year would your daughter

JAMES EDWARD NACE

15

1 have been in on that date? What year of school?

2 A. Sophomore, junior. I don't know.

3 Q. If you don't know, that's okay.

4 A. I don't know.

5 Q. You told me that she graduated in the
6 summer -- spring of 2015?

7 A. Yes.

8 Q. So doing the math, would she have been in
9 the beginning of her 11th grade school year in
10 October of 2013?

11 A. Yes.

12 Q. All right. When did you first become aware
13 of anything unusual about Eric Romig, whether it
14 involved your daughter or not?

15 A. September 26th, 2015.

16 Q. Would that have been a Thursday, to your
17 knowledge?

18 A. Yes.

19 Q. How did you become aware of something
20 unusual about Eric Romig on that day?

21 A. My wife came home very upset and she was
22 crying. And told me that he had texted her or called
23 her several hundred times, at least.

24 Q. Your wife told you this?

25 A. Yes.

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16

1 Q. All right. Do you recall her saying
2 anything else at that time?

3 A. Yes.

4 Q. What else did she tell you at that time?

5 A. She said, I think something unappropriate is
6 going on and we should go to the police.

7 Q. Was there anything else about that
8 conversation that you recall, the one where your wife
9 first told you that there was something going on with
10 Eric Romig and your daughter?

11 A. No.

12 Q. What happened in response to that
13 conversation?

14 A. We went to the police department in
15 Perkasie.

16 Q. Had you spoken to your daughter before you
17 went to the police?

18 A. No.

19 Q. Do you know if your wife had?

20 A. No.

21 MR. GROTH: No, you don't know?

22 THE WITNESS: I don't know.

23 BY MR. KEMETHER:

24 Q. You mentioned something about texts or
25 e-mails between your daughter and Eric Romig.

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17

1 A. Yes.

2 Q. Did you see any of them that day?

3 A. No.

4 Q. Do you know if your wife did?

5 A. No.

6 Q. Do you know how your wife learned about
7 them?

8 A. She -- my daughter had just gotten a new
9 phone. And for some reason my wife looked at the
10 bill and saw a number.

11 Q. And do you know what your wife did in
12 response to seeing the number on that bill?

13 A. No.

14 Q. When you spoke to the police on September
15 26th, 2013, who was with you?

16 A. My wife.

17 Q. Did you do this in person or by phone?

18 A. In person.

19 Q. You drove to the police department and had
20 the talk?

21 A. Yes.

22 Q. Do you know who you spoke with?

23 A. No.

24 Q. What do you recall about that conversation
25 when you were at the police station on September

JAMES EDWARD NACE

18

1 26th, 2013?

2 A. They had -- he -- the officer had asked why
3 we thought there might be something inappropriate
4 going on and we explained to them about the numerous
5 phone calls and texts.

6 Q. Did you have the bill that you were talking
7 about with you?

8 A. The bills with the number on it many times?
9 I don't recall.

10 Q. Did you have your daughter's phone with you
11 at that time?

12 A. I don't recall.

13 Q. Is there anything else you recall about your
14 conversation with the police on September 26th, 2013?
15 When I say your conversation, I'm including your wife
16 because I understand she was there with you.

17 A. No.

18 Q. How long did that conversations last, if you
19 recall?

20 A. Half an hour maybe. I don't recall, really.

21 Q. Do you recall if you left any materials with
22 the police that day?

23 A. No, I don't.

24 Q. Where did you go from the police station?

25 A. Went back home.

JAMES EDWARD NACE

19

1 Q. Was your daughter with you at the police
2 station?

3 A. No.

4 Q. Was your daughter at home when you got home?

5 A. No.

6 Q. Do you know where she was?

7 A. Yes.

8 Q. Where was she?

9 A. She was at practice.

10 Q. Softball practice?

11 A. Yes.

12 Q. And to your knowledge, was Mr. Romig at that
13 practice?

14 A. Yes.

15 Q. Do you remember which team that practice was
16 for?

17 A. The Sellersville Belles.

18 Q. Do you have a rough time of day that that
19 practice would have been?

20 A. Early evening.

21 Q. Do you know how your daughter got to the
22 practice?

23 A. My wife dropped her off.

24 Q. And then you went from there to the police?

25 A. Yes.

JAMES EDWARD NACE

20

1 Q. And when you went home, your daughter wasn't
2 there, she was still at practice. Did someone go get
3 her?

4 A. Yes.

5 Q. That night after you got home from the
6 police, did you talk to Liz about anything pertaining
7 to Eric Romig?

8 A. Yes.

9 Q. What do you recall that discussion
10 involving?

11 A. When she entered the house, she said she was
12 going out with a friend. And then we basically said,
13 no, you need to sit down and we got to talk to you
14 about something. I asked her if there was anything
15 going on.

16 Q. And did she respond to you?

17 A. Yes.

18 Q. What did she say?

19 A. She said, what do you mean by that.

20 Q. Did you respond?

21 A. Yes.

22 Q. What did you say?

23 A. I said, is there something going on with you
24 and Romig.

25 Q. Did she respond to that question?

JAMES EDWARD NACE

21

1 A. Not at first.

2 Q. What did you do when she didn't respond?

3 A. I asked her again, is something going on

4 with you and Romig.

5 Q. And did she respond to the third question?

6 A. Yes.

7 Q. What did she tell you?

8 A. She told me, yes, that there was.

9 Q. Did she say anything besides yes, there was?

10 A. Not at that time.

11 Q. Once you heard her say yes, there was, what

12 did you do?

13 A. I asked her what.

14 Q. Did she respond to that question?

15 A. Yes.

16 Q. What did she say?

17 A. I don't recall exactly what she said.

18 Q. And do you recall approximately what she

19 said?

20 A. Yes. That she was having an affair with

21 him.

22 Q. Did you follow up on that after she told you

23 the words to that effect?

24 A. Yes.

25 Q. What did you say?

JAMES EDWARD NACE

22

1 A. I asked her if it was sexual.

2 Q. Did she respond to that question?

3 A. Yes.

4 Q. What did she say?

5 A. She said no at first.

6 Q. When she said no, did you follow up with

7 her?

8 A. Yes.

9 Q. What did you say?

10 A. I asked her again, is it a sexual

11 relationship, did he have sex with you.

12 Q. Did she respond to that second question?

13 A. Yes.

14 Q. What did she say?

15 A. She said yes.

16 Q. What did you say in response to that?

17 A. I don't recall.

18 Q. How much longer did the conversation with

19 your daughter last that evening?

20 A. I don't recall.

21 Q. Do you recall anything else being said by

22 you, your wife or your daughter that evening about

23 Eric Romig?

24 A. Not really, no.

25 Q. And did your daughter remain home that

JAMES EDWARD NACE

23

1 evening?

2 A. Yes.

3 Q. Was your wife involved during this
4 conversation, as well?

5 A. Yes.

6 Q. Was she talking to your daughter at the same
7 time as you were? I don't mean at the same moment,
8 but during this group conversation.

9 A. No.

10 Q. Did you have her phone with you that day,
11 that evening when you were talking to your daughter?

12 A. Yes.

13 Q. Did you see it?

14 A. Could you clarify see it?

15 Q. Sure. I assume she had a phone. Did you
16 see that she had it with her?

17 A. Yes.

18 Q. Did you ask for it?

19 A. Yes.

20 Q. Did you look at it?

21 A. Not inside -- like -- looked at the phone,
22 it was in my hand, yes.

23 Q. Did you look to see that there were any
24 texts on it between her and Mr. Romig?

25 A. No.

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24

1 Q. Did you look on it to see if there were any
2 e-mails between her and Mr. Romig?

3 A. No.

4 Q. Did you ever discuss the topic of whether
5 there were e-mails or texts on that phone you had
6 that night with your daughter?

7 A. No.

8 Q. Do you know what became of that phone?

9 A. Yes.

10 Q. What became of that phone?

11 A. We took it to the police station.

12 Q. When did you do that?

13 A. If I recall, it was the next day.

14 Q. Do you have any awareness of whether anyone,
15 you, your wife, someone at your request, looked at
16 the phone that your daughter had on the 26th to see
17 if there were any texts on it between her and Eric
18 Romig or e-mails, for that matter?

19 A. No. No one had.

20 Q. I want to make sure I'm clear. My
21 understanding is that no one, to your knowledge,
22 looked at the phone to see if there were any texts or
23 e-mails on it or that they did and found that there
24 were none?

25 A. That night?

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25

1 Q. On the 26th.

2 A. No. It's my understanding no one looked at
3 it that night.

4 Q. How about on the 27th before you brought it
5 to the police?

6 A. No.

7 Q. When you were at the police station on the
8 27th giving them the phone, did you look at the phone
9 to see any texts or e-mails on it?

10 A. No.

11 Q. Do you know if your wife did that day on the
12 27th?

13 A. I don't believe so, no.

14 Q. Are you aware of anyone who looked at the
15 phone looking for texts or e-mails between your
16 daughter and Eric Romig before it was given to the
17 police on September 27th?

18 A. No.

19 Q. Did you have any other conversations with
20 your daughter about the Eric Romig situation before
21 you went back to the police on the 27th?

22 A. No.

23 Q. The 27th would have been a Friday. Did she
24 go to school that day?

25 A. No, I don't believe so.

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26

1 Q. She stayed home?

2 A. Yes.

3 Q. Did she have a schedule of practice with the

4 Sellersville Belles that day?

5 A. No.

6 Q. What time of day do you think you went to

7 the police on the 27th?

8 A. I do not recall.

9 Q. Morning, afternoon, evening? You don't

10 know?

11 A. I don't recall.

12 Q. Did you work that day?

13 A. No.

14 Q. Does your wife have a job?

15 A. Yes.

16 Q. Did she work that day?

17 A. I don't believe so.

18 Q. Had you planned to go back to the police on

19 the 27th or is that something once you had the phone,

20 you thought, this would be a good idea to give it to

21 the police?

22 A. Yes.

23 Q. Did you bring anything else with you to the

24 police on the 27th besides the phone?

25 A. I believe we took her old phone, also.

JAMES EDWARD NACE

27

1 Q. When you say her old phone --

2 A. She had just gotten a new phone.

3 Q. When had she gotten the new phone? Do you
4 remember what day?

5 A. I have no idea. I don't recall.

6 Q. All right. Did you bring the old phone to
7 the police, as well?

8 A. Yes.

9 Q. Same question. Did someone look at that
10 phone, what we're calling the old phone, before
11 giving it to the police to see if there were any
12 texts or e-mails on there between your daughter and
13 Eric Romig?

14 A. No.

15 Q. Did you ever talk to your daughter before
16 giving the phones to the police about the nature of
17 any e-mails or texts --

18 A. No.

19 Q. -- between her and Eric Romig?

20 A. (Witness shakes head.)

21 Q. What happened during the meeting on the 27th
22 with the police?

23 A. I don't recall.

24 Q. Was it the -- did you meet with the same
25 person you'd met with the day before?

JAMES EDWARD NACE

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1 A. I believe so.

2 Q. How long do you think that meeting was on

3 the 27th with the police?

4 A. I don't recall.

5 Q. What else do you remember -- what else, if

6 anything, do you remember about the 27th of

7 September?

8 A. I don't.

9 Q. You don't?

10 A. I don't know.

11 Q. The 28th was a Saturday, obviously no

12 school. Do you know if there was a Sellersville

13 Belles practice that day?

14 A. Yes.

15 Q. Did your daughter attend it?

16 A. Yes.

17 Q. Was Eric Romig there?

18 A. Yes.

19 Q. Who brought her to that practice?

20 A. My wife.

21 Q. Were there any talks with your daughter on

22 the 28th of September about anything pertaining to

23 Eric Romig?

24 A. I don't recall.

25 Q. Was there anything else about the 28th of

JAMES EDWARD NACE

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1 September that you do remember besides your daughter
2 going to the Sellersville Belles practice?

3 A. Just the fact that I did not want her to go.

4 Q. Did you tell her that?

5 A. Yes.

6 Q. And what did she say? She, being your
7 daughter.

8 A. She said, I want to go.

9 Q. And you ultimately decided to let her go?

10 A. Yes.

11 Q. Did your wife want her to go to the
12 practice?

13 A. I don't know.

14 Q. When, if at all, did you next speak to your
15 daughter about anything pertaining to Eric Romig?

16 A. I didn't.

17 Q. To this day, have you ever spoken to her
18 again about Eric Romig?

19 A. No.

20 Q. Do you know if your wife has?

21 A. I do not know.

22 Q. Were there any other Sellersville Belles
23 practices that you're aware of that your daughter
24 went to before Eric Romig was arrested on October
25 1st?

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1 A. No.

2 Q. Prior to September 26th, 2013, had your
3 daughter ever been to a psychiatrist, psychologist,
4 any mental health provider for any reason?

5 A. No.

6 Q. Are you aware that she's been to any
7 psychiatrist, psychologist or mental health providers
8 since September 26th, 2013?

9 A. Yes.

10 Q. What are you aware of in that regard?

11 A. I'm aware that she's been to two or three of
12 them, possibly.

13 Q. Two or three different ones?

14 A. Two or three different ones.

15 Q. Do you know the names of any of them?

16 A. I believe the one she is with now is --

17 MR. GROTH: Hold on a second. I'm
18 going to object in terms of the witness answering any
19 questions regarding any expert evaluation or
20 assessment of Liz that is being done for this case,
21 the reports for which are due on December 15th.

22 MR. KEMETHER: Okay. I'm not
23 seeking to find out expert information.

24 MR. GROTH: I want to make sure the
25 witness understood.

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1 MR. RUSSELL: Asking for treating
2 doctors.

3 MR. GROTH: He's asking whether or
4 not she was treated by any counselors or
5 professionals after the Romig revelation up until
6 this lawsuit, I would say.

7 BY MR. KEMETHER:

8 Q. Up until now -- and I'm aware that -- at
9 least I'm now aware that there may be someone that
10 may be what we call an expert in this case who is
11 going to evaluate her just for purposes of this
12 litigation. I'm not asking about that.

13 Do you understand the distinction we're
14 making?

15 A. Not really, no.

16 Q. All right. People that you or your wife or
17 your daughter have arranged to go to see on your own,
18 on your own for -- to give her mental health
19 assistance as opposed to people that have been
20 arranged through your attorney. Does that help for
21 the distinction?

22 A. A little.

23 Q. Okay. Using that scope or definition, do
24 you know who she's been seeing, if anyone?

25 A. No.

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1 Q. Do you know how often she's been to see a
2 mental health provider of any kind?

3 A. I think it's approximately 15 times.

4 Q. About 15 times in total?

5 A. (Witness nods head.)

6 Q. Did you become aware prior to October 1st
7 that your daughter had a third phone, this one
8 supplied to her from Eric Romig?

9 A. No.

10 Q. Were you aware of that before today?

11 A. Yes.

12 Q. Do you know anything about the details of
13 when or how she got that phone?

14 A. Yes.

15 Q. What do you know about that?

16 A. That it was placed on our back porch by Eric
17 Romig.

18 Q. On your back porch?

19 A. Yes.

20 Q. Do you know roughly when? I understand it
21 was before he was arrested, but approximately when?

22 A. No.

23 Q. And how did you learn about that?

24 A. Through the detectives, I believe.

25 Q. How many times did you speak with the police

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1 overall about this situation, if you can recall?

2 A. Maybe four.

3 Q. Were the other two before or after Mr. Romig
4 was arrested?

5 A. Before.

6 Q. Did you speak to the police at all -- I'm
7 not talking about being in court for any sort of
8 hearings -- did you speak to the police at all after
9 he was arrested?

10 A. Possibly. I'm not sure.

11 Q. Did they ask to record a statement with you
12 or your wife?

13 A. I don't think so.

14 Q. Are you aware if they asked to record
15 anything involving your daughter; in other words,
16 speaking to your daughter?

17 A. I'm not aware of it.

18 Q. Prior to Mr. Romig's arrest on October 1st,
19 did you or your wife contact anyone at Pennridge High
20 School about this situation?

21 A. I did not.

22 Q. Do you know if your wife did?

23 A. I do not.

24 Q. Do you know if anyone on behalf of your
25 family did?

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1 A. I do not.

2 Q. To this day, have you or your wife contacted
3 anybody at Faith Christian Academy about Eric Romig?

4 A. I have not.

5 Q. Do you know if your wife has?

6 A. I don't know.

7 Q. Anyone other than your attorney, are you
8 aware -- have done so on your behalf?

9 A. No. Not that I'm aware of.

10 Q. Prior to September 26th, 2013, which is the
11 day you told me you learned about your daughter's
12 relationship with Eric Romig, was there anything
13 about her high school experience that you were aware
14 that was negative, that she was doing bad in school,
15 having emotional problems, having behavioral
16 problems, anything of that sort?

17 A. No.

18 Q. So would it be fair to say that she spent
19 another two years in high school after the situation
20 with Eric Romig came to light?

21 A. Yes.

22 Q. During those two years of high school, did
23 her grades change significantly, one way or the
24 other?

25 A. In the very beginning, they dropped

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1 somewhat.

2 Q. When you say in the very beginning, so
3 basically in the fall of 2013?

4 A. Yes. After the incident.

5 Q. For how long a period do you think that they
6 changed?

7 A. I'm not positive on that. Say maybe a
8 marking period, but I'm not sure.

9 Q. For the remainder of the -- of her
10 schooling, did her grades remain roughly the same as
11 they had been before this incident, before you
12 learned of this incident, I should say?

13 A. Yes.

14 Q. In terms of her participation in school or
15 extracurricular activities, did that change at all
16 after September 26th, 2013?

17 A. I don't believe so, no.

18 Q. She continued to stay on the Pennridge
19 softball team for the last two years of high school?

20 A. Yes.

21 Q. Did she play for the Sellersville Belles,
22 did she continue to play for them?

23 A. Yes.

24 Q. Was your daughter involved in any other
25 teams, clubs, groups of any kind, whether through the

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1 school or outside of the school during this two year
2 period?

3 A. Yes.

4 Q. What other ones were you aware that she was
5 part of?

6 A. I believe it was called a Key Club at the
7 school.

8 Q. Do you know what that has to do with?

9 A. Not really.

10 Q. Do you know if she'd been part of the Key
11 Club before September of 2013?

12 A. I don't recall.

13 Q. Any other clubs, teams?

14 A. She was in Girl Scouts, involved in Girl
15 Scouts.

16 Q. Was that still in high school she was?

17 A. Yes.

18 Q. Did she continue in her junior and senior
19 year?

20 A. Yes.

21 Q. Any other ones?

22 A. I believe the National Honor Society. I
23 don't know if that --

24 Q. Do you know if she'd been on the National
25 Honor Society before September of 2013?

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1 A. Yes, I believe so.

2 Q. And at any point did she come off of it
3 because of grades or some other reason?

4 A. No.

5 Q. Do you have an understanding of where she
6 was in her class when she graduated, you know, grade
7 wise?

8 A. Yes.

9 Q. Ballpark, tell me where that would have
10 been.

11 A. If I recall, it was somewhere in the 70's,
12 70's.

13 Q. Okay. And how many were in the class?
14 Ballpark.

15 A. Not positive, but I think five or 600.

16 Q. Did your daughter's experience in her junior
17 year of high school, was it as positive as the ones
18 in freshman and sophomore year had been overall?

19 MR. GROTH: Object to the form.

20 You can answer.

21 A. I don't know.

22 Q. Did you notice any difference in her
23 behavior during her junior year?

24 A. Yes.

25 Q. Or 11th grade year, I'm sorry, I should say.

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1 A. As far as school?

2 Q. As far as just her overall behavior.

3 A. She seemed a bit clingier, seemed afraid of

4 some things, didn't like being alone.

5 Q. Do you know did she express what she was

6 afraid of?

7 A. No.

8 Q. Does she have friends through the school?

9 A. Yes.

10 Q. Did she continue to spend time with those

11 friends?

12 A. Not all of them.

13 Q. Not all of them. Were there some that she

14 stopped being friends with?

15 A. I wouldn't say stopped being friends, but --

16 Q. What would you say?

17 A. Not hanging around.

18 Q. Do you have an understanding of why that was

19 the case?

20 A. No.

21 Q. Did she ever tell you?

22 A. No.

23 Q. Do you know if she had a boyfriend at all

24 after -- in her 11th grade or 12th grade?

25 A. Yes.

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1 Q. Do you know his name or their names?

2 A. I believe it's Brooks. Countiss, I believe

3 his last name is.

4 Q. How did you become aware that he and your

5 daughter were seeing each other?

6 A. He was her prom date.

7 Q. Do you know if they had a relationship other

8 than going to the prom?

9 A. Yes.

10 Q. What do you know about that?

11 A. Just that they would go to the park on

12 occasions and they would -- I guess dating.

13 Q. Over what period of time did you understand

14 that they were dating?

15 A. I don't recall.

16 Q. Do you know if she's still friends with him?

17 A. I don't believe so.

18 Q. Any other boyfriends that you're aware of

19 during her 11th or 12th grade years?

20 A. No.

21 Q. Does she have one now?

22 A. Yes.

23 Q. Do you know his name?

24 A. Josh.

25 Q. Did she meet him in college?

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1 A. No.

2 Q. Do you know Josh's full name?

3 A. No.

4 Q. How long are you aware that she's dated

5 Josh?

6 A. Not exactly sure.

7 Q. Was it while she was still in high school?

8 A. Not sure.

9 Q. Have you met Josh?

10 A. Once.

11 Q. Other than anything involving Eric Romig or

12 having to testify here in court or anything like

13 that, are you aware of any negative experiences

14 during her 11th or 12th grade years?

15 MR. GROTH: Object to the form.

16 You can answer.

17 A. No.

18 Q. Did she ever express to you that she wanted

19 to go to a different high school after you learned of

20 the Eric Romig situation?

21 A. No.

22 Q. Prior to your learning of the Eric Romig

23 situation, had your daughter started to make any

24 plans to go to college? Was she looking at schools,

25 thinking about certain schools, anything like that?

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1 A. She talked about going to college.

2 Q. Did she talk about any schools in
3 particular?

4 A. I don't think at that time.

5 Q. Do I understand that during her 11th and
6 12th grade years she started looking at specific
7 colleges to go to?

8 A. Yes.

9 Q. Do you know how many of them there were?

10 A. Three or four.

11 Q. Do you know the names of them?

12 A. One was York. One was Lycoming where she is
13 now. One was Kutztown. She looked at one in
14 Virginia. I forgot the name of it.

15 Q. Were there any schools that you understood
16 that she might have wanted to go to originally, but
17 didn't because of something having to do with this
18 Eric Romig situation?

19 A. No.

20 Q. Were there any activities that you're aware
21 of that she had an interest in or whether she was
22 actually doing them or wanted to do them, but chose
23 not to do them because of this Eric Romig situation?

24 A. No.

25 Q. Between September 26th and October 1st,

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1 2013, did you speak to Eric Romig?

2 A. No.

3 Q. Do you know if your wife did?

4 A. I do not know.

5 Q. Do you know if anyone at your request did?

6 I'm not talking about your daughter.

7 A. No.

8 Q. Did your daughter have a plan as to what
9 field she wanted to get into in college before you
10 learned of this Eric Romig situation? Did she want
11 to be a teacher, lawyer, doctor, anything like that?

12 A. Yes.

13 Q. Do you understand what that would have been?

14 A. Criminal justice.

15 Q. And did that change after you learned of the
16 Eric Romig situation? In other words, the field that
17 she expressed an interest in getting involved in.

18 A. No.

19 Q. Is that something she's studying now?

20 A. Yes.

21 Q. Has she declared a major? I know it's her
22 freshman year, first year of college, I don't know if
23 she declared a major yet.

24 A. No, she has not.

25 Q. She's been in college now for about almost

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1 two months?

2 A. Yes.

3 Q. Do you have any understanding of how that
4 experience is going for her?

5 A. Yes.

6 Q. Can you tell me?

7 A. She seems to be acclimating fairly well.

8 Q. Do you know if she's made some new friends
9 there?

10 A. Yes.

11 Q. Have you met any of them?

12 A. No.

13 Q. Has she been home yet?

14 A. Yes.

15 Q. How many times?

16 A. Possibly three.

17 Q. Have you been up to her college yet?

18 A. Yes.

19 Q. Aside from moving her in, how many times?

20 A. Twice, I believe.

21 Q. Have you expressed -- excuse me. Has she
22 expressed anything to you so far in college about any
23 bad experiences or negative experiences she's having
24 there?

25 A. No.

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1 Q. Do you know if she's receiving mental health
2 treatment now while she's in college?

3 A. No.

4 Q. Does she have a job?

5 A. Not right now.

6 Q. Did she have one before she went to college?

7 A. Yes.

8 Q. What did she do this last summer?

9 A. She worked for Acme Markets.

10 Q. As a --

11 A. Bagger, in the bakery.

12 Q. And do you have an understanding what she's
13 going to do over winter break in terms of a job or
14 anything like that, is she going to come home, stay
15 up there?

16 A. I believe she's coming home and working.

17 Q. Is she a member of any teams in college?

18 A. Yes.

19 Q. What teams is she on?

20 A. Softball team.

21 Q. And is she a member of any other clubs or
22 programs in college that you're aware of? Seems like
23 a pretty full schedule she's got going right now, but
24 I thought I'd ask.

25 A. Not sure.

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1 Q. Have you had any mental health treatment in
2 the last two years that you attribute to what
3 happened to your daughter?

4 A. No.

5 Q. Are you aware if your wife has?

6 A. No.

7 MR. KEMETHER: I think those are
8 all the questions I have for you at the moment. I
9 will let some of the other lawyers ask some. If I
10 have any more, I'll follow up with you.

11 * * *

12 EXAMINATION

13 BY MR. RUSSELL:

14 Q. Mr. Nace, my name is Jonathan Russell. And
15 I represent the Faith defendants. And one of the
16 opportunities we have when we take your deposition is
17 to ask some questions trying to figure out some
18 things that may not make sense to us and hopefully
19 you can shine some light on that. So I hope I don't
20 cover some information that's already been addressed.

21 We already took your daughter's
22 deposition. And in listening to your daughter talk
23 about this whole experience, she seemed to be the
24 type that didn't want to have her name or her
25 reputation out in the public at all. Would that be

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1 accurate?

2 A. Yes.

3 Q. And knowing that the criminal case was
4 completed, one of the things that was curious to me
5 was why file the civil lawsuit knowing that her name
6 would be protected in the criminal case, but in the
7 civil lawsuit, you know, there's -- there's going to
8 be a document associated with this, be it's going to
9 be memorialized for all time.

10 I just wondered, was it your idea to file
11 the civil lawsuit or whose idea was it?

12 A. No, it was not my idea.

13 Q. Whose idea was it?

14 A. It was our idea, my wife's and I and my
15 daughter's.

16 Q. She wanted to do it, as well?

17 A. Yes.

18 Q. I was curious, too, knowing that you had a
19 certain amount of time to file the lawsuit, why file
20 the lawsuit during her senior year before her
21 softball season ended or her academic career at
22 Pennridge ended?

23 A. I don't know that the time mattered.

24 Q. Well, your daughter testified that after the
25 lawsuit was filed, there was some press about this

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1 case. It was in the local papers that the lawsuit
2 had been filed. Certainly that press exposure put
3 exposure on her and you acknowledge, too, that she
4 didn't really want exposure put on her. I just
5 wondered, do you know why you filed at that time?

6 A. No.

7 Q. Do you know if you could have filed later
8 after she had graduated from high school and finished
9 her career at Pennridge?

10 MR. GROTH: I'll object to the
11 question insofar as it may ask for some legal
12 expertise or whatever.

13 But you can answer.

14 A. I don't know.

15 Q. It's my understanding that in filing this
16 lawsuit, your hope is to have your daughter
17 compensated monetarily. Is that right?

18 A. Yes.

19 Q. And Mr. Groth has communicated to us that
20 the monetary expectation is in excess of a million
21 dollars. Is that your understanding, as well?

22 MR. GROTH: Object to the form.

23 Instruct him not to answer. Any discussions that I
24 have with my clients about the value of the case or
25 settlement discussions is not something that's

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1 discoverable, No. 1.

2 And No. 2, I'm not sure the settlement
3 discussions that counsel have with each other are
4 also something that should be discovered -- subject
5 of pre-trial discovery.

6 But he can answer the question.

7 MR. RUSSELL: What was the
8 question?

9 (Whereupon, the reporter read back the
10 referred-to portion of the record.)

11 MR. GROTH: I'll object to the
12 question, also, because that assumes a fact not in
13 evidence, No. 1.

14 And the settlement discussions that I've
15 had with one person in this case, I don't think were
16 in terms of expectations at all. We were talking in
17 terms of possible ranges in values or whatever. So I
18 think your question is misleading in that way.

19 But, again, if you can answer, you can
20 answer.

21 THE WITNESS: I have no knowledge
22 of that.

23 BY MR. RUSSELL:

24 Q. Because part of what our job is is to
25 understand the damages that have been claimed and

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1 sustained and then trying to monetize that in some
2 way. So that's our job as the attorneys that are
3 representing those who have been sued. So we have to
4 kind of ask questions about those damages in order to
5 gain an understanding of what's a fair and reasonable
6 value for the damages that are claimed.

7 It's my understanding what's been put
8 forth to us right now, we have 14 visits to a
9 counselor. I think you said it may have been 15, 14
10 or 15 visits. Is that right?

11 A. Yes.

12 Q. Did you go to any of those visits or
13 appointments?

14 A. No.

15 Q. Did your wife go to any of those
16 appointments?

17 A. Yes.

18 Q. Your daughter has previously testified --
19 did you review her deposition before today?

20 A. Yes.

21 Q. Did you review any other depositions other
22 than your daughter's?

23 A. No.

24 Q. In your daughter's deposition, she testified
25 that she didn't want to go to the counselor, but that

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1 you and your wife insisted that she go. Do you
2 remember reading that?

3 A. Yes.

4 Q. And we have been provided with no treatment
5 notes from any medical doctors. Are you aware that
6 she treated with any medical doctors at all?

7 MR. GROTH: Relating to the Romig
8 situation?

9 Q. Relating to the Romig situation.

10 A. No, not at all.

11 Q. We have been provided no indication that
12 she's ever been prescribed prescription medication.
13 Are you aware that she's ever been prescribed
14 prescription medications as a result of anything
15 associated with her claim?

16 A. No.

17 Q. Additionally, in looking through her school
18 records, it doesn't look like she missed any more
19 school in her junior and senior years than she missed
20 in any other -- in her sophomore or freshman year.

21 Is that your understanding, as well?

22 A. Yes.

23 Q. And would it be accurate to say that this
24 incident with Mr. Romig did not impact her academic
25 career? I think you've testified she finished 74th

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1 out of -- it's actually 560, she knew that. You knew
2 it was between five and 600. Is that right?

3 MR. GROTH: I'll object to the
4 form. I think it's a couple questions there. But
5 I'll object to the form of the question with regard
6 to impact on her academic life.

7 MR. RUSSELL: Let me rephrase and I
8 apologize if it was inartfully phrased.

9 BY MR. RUSSELL:

10 Q. Are you aware that this incident with Mr.
11 Romig has impacted your daughter's academic career at
12 all?

13 MR. GROTH: Object to the form of
14 the question.

15 You can answer.

16 A. No.

17 Q. You're not aware or it has not impacted?

18 A. It has not impacted.

19 Q. In fact, she was able to get a scholarship
20 to Lycoming College for about \$26,000, right?

21 A. I'm not sure if that's the amount, but, yes,
22 she had a scholarship.

23 Q. And she applied and was admitted to all
24 three colleges -- she was admitted to all three
25 colleges she applied to. I think you thought she

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1 went to four, but I think she testified, if you read
2 her deposition, that she applied to three and got in
3 to all three. Is that right?

4 A. Yes.

5 Q. In her deposition, she also talked about she
6 thought about going out of state, but that her
7 parents didn't want her to go out of state. Do you
8 remember telling her not to apply to colleges out of
9 state?

10 A. Just Texas.

11 Q. And why was that?

12 A. It's Texas.

13 Q. Too far or you just don't like Texas?

14 A. It's Texas.

15 Q. But was there any other reason? I mean,
16 could she have gone to New Jersey or gone to
17 Massachusetts or anything like that?

18 A. Yes.

19 Q. It was okay with you?

20 A. Yes.

21 Q. And would it be accurate to say that this
22 incident with Mr. Romig did not impact her softball
23 career?

24 MR. GROTH: Object to the form.

25 Asks for speculation.

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1 You can answer.

2 Q. As it related to high school. Let me
3 qualify it. I'm not talking about college at this
4 point. But did this incident with Mr. Romig impact
5 her softball career at all?

6 MR. GROTH: Object to the form.

7 You can answer.

8 A. No.

9 Q. And, in fact, I think she testified that
10 personally she continued to do better in her junior
11 year and then her senior year, correct?

12 A. Is the question that she testified or what I
13 think?

14 Q. Let's go both ways. She testified her
15 personal stats were better in her junior year and
16 senior year. Do you recall her testifying to that?

17 A. I don't recall her testifying to that, no.

18 Q. Were they better or not?

19 A. My opinion, absolutely not. She didn't get
20 as much playing time.

21 Q. She also testified that her relationship
22 with you and your wife was better after all this
23 happened than it was before. Would that be -- she
24 testify to that?

25 A. Yes.

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1 Q. And do you recall -- would that be
2 consistent with your characterization of your
3 relationship?

4 A. No.

5 Q. How so? Tell me why.

6 A. I think it's about the same.

7 Q. It's not gotten worse?

8 A. No.

9 Q. It's my understanding in this lawsuit
10 there's no claim by you or your wife for any
11 emotional distress that this situation has caused
12 either of you, correct?

13 A. Yes.

14 Q. Additionally, in trying to aid in my
15 understanding, is why you sued certain entities and
16 not others. I'm not asking for a legal opinion, but
17 I'm asking to why certain people were sued and others
18 were not.

19 It's my understanding that you sued Faith
20 Christian Academy defendants because you believe that
21 Eric Romig had done something similar to students at
22 Faith Christian Academy. Is that your understanding?

23 A. Yes.

24 Q. Do you still believe that now as you sit
25 here today?

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1 A. Yes.

2 Q. Do you think that sexual intercourse
3 occurred between Mr. Romig and any girls at Faith
4 Christian Academy?

5 A. I don't know.

6 Q. So what gives you the belief that it did
7 happen?

8 MR. GROTH: I'm going to object to
9 the form of the question insofar it asks him to
10 reveal conversations he had with counsel that are
11 privileged. And if he has any information other than
12 information that he got from his own counsel, he can
13 testify to it.

14 But not anything that you've heard from
15 your own attorney.

16 A. Could you please repeat the question?

17 Q. Other than in conversation or information
18 that you've learned from your attorney, what
19 knowledge do you have, if any, that Mr. Romig engaged
20 in sexual intercourse with any students at Faith
21 Christian Academy?

22 A. None.

23 Q. And I would tell you that we don't have any
24 information that that occurred, either.

25 Do you have any information, other than

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1 what you may have heard from your attorney or been
2 told by your attorney, that sexting occurred between
3 Mr. Romig and any students at Faith Christian
4 Academy?

5 A. Yes.

6 Q. You have information that that happened?

7 A. Yes.

8 Q. And what is your knowledge of that?

9 A. That it had happened on a school bus. I
10 believe it was a basketball -- going to a basketball
11 game.

12 Q. And what happened?

13 A. He was inappropriately texting.

14 Q. And let me back up. When I said sexting, I
15 meant sending video or pictures of someone's sexual
16 organs and sending it to someone else. So I'll get
17 to texting in a second.

18 Do you have any information -- because my
19 understanding, that happened between your daughter
20 and Mr. Romig, that they sent pictures to one another
21 of themselves in various stages of undress. Do you
22 have any information that that happened to -- between
23 Mr. Romig and another student at Faith Christian
24 Academy?

25 A. No.

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1 Q. It's my understand that your daughter slept
2 over Mr. Romig's house. Is that right?

3 A. I don't know.

4 Q. Do you have any information that any
5 students at Faith Christian Academy ever slept over
6 at Mr. Romig's house alone together?

7 A. No.

8 Q. Do you have any information that any content
9 of actual text messages sent between Mr. Romig and
10 any student of any inappropriate nature was ever
11 obtained or disclosed at Faith Christian Academy?

12 MR. GROTH: Other than through
13 conversations with counsel.

14 A. No.

15 Q. The Complaint that you filed on behalf of
16 your daughter when she was a minor, states that there
17 was a student with initials E.M. And we've
18 subsequently taken -- her name is Emily Mayer. Did
19 you ever talk to Emily Mayer?

20 A. No.

21 Q. Emily Mayer's father is Kevin Smith,
22 stepfather is Kevin Smith, the mother is Annette
23 Smith. Have you ever spoken to Kevin Smith or
24 Annette Smith?

25 A. No.

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1 Q. Do you have any understanding, other than
2 what's been told to you through your counsel, why
3 Emily Mayer never reported anything to the police or
4 to child protective services or to Children and Youth
5 about any -- any interaction between herself and Eric
6 Romig?

7 A. No.

8 Q. Do you know why Kevin Smith or Annette Smith
9 never reported to the police or Children and Youth
10 any interaction between their daughter and Eric
11 Romig?

12 A. No.

13 Q. Did you ever -- do you know that Emily
14 Mayer's father was a former Montgomery County
15 detective?

16 A. No.

17 Q. Your Complaint that you filed on behalf of
18 your minor daughter also mentions a student Kristen
19 Kennedy. Did you ever speak to Kristen Kennedy?

20 A. No.

21 Q. Kristen Kennedy has also already given her
22 deposition in this case and she's testified that she
23 didn't consider any communication between herself and
24 Mr. Romig at the time to be sexual abuse. Did you
25 ever hear that from anyone other than your attorney?

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1 A. No.

2 Q. Your Complaint mentions a Lauren Fretz. Did
3 you ever speak to -- or L.F. is actually Lauren
4 Fretz. Have you ever spoken to Lauren Fretz?

5 A. No.

6 Q. Are you aware that Lauren Fretz has
7 indicated that nothing inappropriate ever happened
8 between her and Mr. Romig?

9 MR. GROTH: Object to the form of
10 the question.

11 You can answer.

12 A. No.

13 Q. With that being said, is it still your
14 belief as you sit here today that Faith Christian
15 Academy should have reported something about Eric
16 Romig when Eric Romig was a coach at Faith Christian
17 Academy?

18 MR. GROTH: I'll object insofar as
19 the allegations in the complaint are based upon the
20 investigation of counsel which were shared with
21 clients at some point during the investigation and
22 led to the preparation of the Complaint.

23 To the extent that he has any other
24 information outside of what counsel told him about
25 that, he's -- whether it comes from detectives or

JAMES EDWARD NACE

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1 somebody else who may have discussed them with him,
2 he's free to answer.

3 A. No.

4 Q. Do you know why you didn't sue Emily Mayer
5 as part of your Complaint? She turned 18 during the
6 middle of her reporting what transpired between
7 herself and Mr. Romig, meaning she was legally an
8 adult. Do you know why you didn't sue her?

9 MR. GROTH: Object to the form
10 insofar as it requires some legal expertise.

11 But he can answer.

12 A. No.

13 Q. Do you know why you didn't sue Kevin Smith
14 or Annette Smith who are the parents of Emily Mayer?

15 MR. GROTH: Same objection.

16 You can answer.

17 A. No.

18 Q. One thing that's really intrigued me a
19 little bit here, as to why the Sellersville Belles
20 were never sued. Do you know why they were never
21 sued?

22 MR. GROTH: Same objection. Calls
23 for legal opinion and legal expertise.

24 You can answer if you can.

25 A. No.

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1 Q. According to Elizabeth, when she testified,
2 she had sex several times while Mr. Romig was
3 coaching the Belles after the season had ended with
4 Pennridge. Is that your understanding, as well?

5 A. Yes.

6 Q. And I thought that there was some indication
7 that she was with the Belles for two years, but was
8 she only with the Belles for one year or at least --
9 was the first year she was with the Belles, was it
10 the summer between her sophomore and junior year?

11 A. I believe so.

12 Q. Did you ever go on any overnight trips with
13 the Belles where you had to stay in a hotel because
14 there was a tournament somewhere?

15 A. Yes.

16 Q. How many times?

17 A. I don't recall.

18 Q. And Mr. Romig would have been on those
19 overnight trips, as well?

20 A. No.

21 Q. Did the team stay in a particular hotel?

22 A. Yes.

23 Q. But he didn't stay there?

24 A. I don't believe he was the coach at the
25 time.

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1 Q. So when -- in the summer between the
2 sophomore and junior years, there have been no
3 overnight trips that you're aware of at that time or
4 before that time, before he was arrested?

5 MR. GROTH: While he was the coach?

6 Q. While he was the coach.

7 A. I don't believe so.

8 Q. Was -- did you reach a settlement with the
9 Belles?

10 A. No.

11 Q. And I don't want you to take this the wrong
12 way. But to the extent that you're trying to put
13 some degree of blame on Faith Christian Academy, I'm
14 not trying to put any blame on you any more than
15 what's being posited on Faith Christian Academy. But
16 it's my understanding that the cell phone that
17 Elizabeth used to text, call and send naked pictures
18 of herself to Eric Romig was owned by you. Is that
19 right?

20 A. Yes.

21 Q. And you paid the bill for that phone?

22 A. My wife did, yes.

23 Q. And you could go on line and look at the
24 texts, who they're sent from and the numbers that
25 they're sent from, you had access to that, or you or

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1 your wife did?

2 A. I don't know.

3 Q. It's my understanding that there was some
4 indication that for at least perhaps a year before
5 Mr. -- before you found out about the relationship
6 between Eric Romig and Elizabeth, your daughter, that
7 your daughter had been secretive about the use of her
8 cell phone. Were you aware of that at all?

9 MR. GROTH: Object to the form of
10 the question.

11 You can answer.

12 A. No.

13 Q. It's my understanding one of the covers that
14 Elizabeth had for spending the night over at Eric
15 Romig's house was she was spending the night at her
16 friend Ally's house. Is that your understanding?

17 A. Yes.

18 Q. Do you know why no one -- did you ever call
19 Ally or Ally's mom to confirm that she was going over
20 there or that everything was okay?

21 A. No.

22 Q. Do you know why you didn't?

23 A. I trusted her.

24 Q. Trusted who?

25 A. Liz.

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1 Q. The other thing that I don't understand and
2 I'm hopeful that you can help me out with, is that
3 you reported this to the police on the 26th of
4 September, correct?

5 A. Yes.

6 Q. And at the time that you reported it, you
7 felt that something was going oddly on between Eric
8 Romig and your daughter, right?

9 A. Yes.

10 Q. That's why you went to the police?

11 A. Yes.

12 Q. But yet at the same day that you reported
13 it, you allowed your daughter to go to the Belles
14 practice that same night. Is that right?

15 A. She was already there when I found out, yes.

16 Q. Okay. Was there any discussion about
17 going -- picking up your daughter from this person
18 that you believed had some sort of relationship,
19 enough that you were going to go to the police, and
20 remove her from that situation?

21 A. Yes.

22 Q. And why didn't you do that?

23 A. We were at the police station.

24 Q. Before you went to the police, I mean. You
25 had to make a decision to go to the police. You felt

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1 that it was enough -- you had enough evidence or
2 something was amiss for you to go to the police,
3 right?

4 A. Yes.

5 Q. Why didn't you go pick up your daughter
6 first before you went to the police?

7 A. Wasn't thinking clearly. Wanted to do the
8 right thing. Went directly to the police.

9 Q. Then that occurred on the 26th and it's my
10 understanding that you spoke to your daughter that
11 evening after you picked her up from practice, you
12 confronted her in your home, right?

13 A. Yes.

14 Q. She initially denied it and then she
15 acknowledged that she was having an inappropriate
16 sexual relationship with Eric Romig?

17 A. Yes.

18 Q. And then that was Thursday. The 27th is
19 Friday and the 28th is another Belles practice,
20 right?

21 A. Yes.

22 Q. And you allowed her to go to the Belles
23 practice, correct?

24 A. Yes.

25 Q. Why?

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1 A. We wanted things to be as normal as
2 possible.

3 Q. But did you believe that Eric Romig was a
4 sexual predator at that time?

5 A. No.

6 Q. But you believed he had done something
7 improper, you confronted your daughter on the 26th
8 and she acknowledged that she had been having sexual
9 relations with a married man, you know, twice her
10 age, right?

11 A. Yes.

12 Q. And you thought it was okay for her to go to
13 practice on the 28th?

14 A. No. I said absolutely not. We argued about
15 it and we wanted to keep it as normal as possible and
16 my wife was not to leave the field during the
17 practice.

18 Q. I think your daughter may have testified
19 that she had communication with Eric Romig and they
20 discussed the cell phone issue at that time. Are you
21 aware of that -- the third cell phone?

22 A. No.

23 Q. Additionally, when did you learn that
24 Elizabeth's charm necklace in the shape of a heart
25 was given to her by Eric Romig?

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1 A. Didn't know anything about it.

2 Q. So it was never told to you by your wife or
3 your daughter that was given to her by Eric?

4 A. No.

5 Q. It's my understanding that you knew Mr.
6 Romig for at least two years before this incident
7 occurred, right?

8 A. Approximately, yes.

9 Q. And you trusted him?

10 A. Yes.

11 Q. You had no reason to believe that there was
12 anything inappropriate going on between him and your
13 daughter?

14 A. No.

15 Q. Would you characterize him as a good guy
16 before this incident happened?

17 A. Didn't know him that well.

18 Q. Do you believe as you sit here today that
19 there's anything that you could have done or your
20 wife could have done differently that would have
21 prevented your daughter from developing an
22 inappropriate sexual relationship with Eric Romig?

23 MR. GROTH: Object to the form of
24 the question. Calls for speculation.

25 But you can answer.

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1 A. No.

2 MR. RUSSELL: I'm going to show you
3 and we can mark this as --

4 (Whereupon, J. Nace Exhibit 1, Letter, was
5 marked for identification.)

6 BY MR. RUSSELL:

7 Q. I'm showing you what's been marked as J.
8 Nace 1. I'd ask for you to read that quietly to
9 yourself and then let me know when you're finished.

10 A. Okay.

11 Q. Is this your statement that you prepared?

12 A. Yes.

13 Q. This was prepared for the sentencing of Mr.
14 Romig?

15 A. Yes.

16 Q. In there you talked about -- and this is the
17 second paragraph, the third sentence in. This is a
18 person that we, and a lot of people, I have known for
19 years, trusted with our children on a daily basis.

20 Was it more than two years that you knew
21 him?

22 A. No.

23 Q. And then if you go down to the fourth
24 paragraph, it said, when we first became aware of
25 this on September 29th, 2013, I was in total shock.

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1 I think you testified that you actually became aware
2 of it on September 26th. Is that right?

3 A. Yes.

4 Q. Are you aware of whether or not there had to
5 be any special accommodations made for Elizabeth when
6 she went off to Lycoming?

7 A. No.

8 Q. There were no special accommodations needed
9 for her?

10 A. No.

11 Q. And she is trying out for the girl's
12 softball team or she's on the team?

13 A. She's on the team.

14 Q. When does the season start or has it
15 started?

16 A. They played one tournament this fall. That
17 was it. It's over.

18 Q. And then they start up in the spring?

19 A. Yes.

20 MR. RUSSELL: That's all the
21 questions I have.

22 MS. CONNOR: I just have a few
23 questions for you for clarification.

24 * * *

25 EXAMINATION

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1 BY MS. CONNOR:

2 Q. When you went back to the police station on
3 the 27th and you had Liz's phone with you, did you
4 bring Liz with you, as well? You said that she
5 didn't go to school, I think, that day.

6 A. I don't -- no, I don't think so.

7 Q. So she didn't go with you to the police
8 station?

9 A. No.

10 Q. And on the 26th when you confronted her
11 concerning Romig, what was her demeanor during that
12 conversation?

13 A. She was very quiet. Didn't want to speak
14 too much.

15 Q. What about your demeanor during that
16 conversation?

17 A. Angry. Scared. Didn't know what to do.
18 Confused.

19 Q. What about your wife, was she part of the
20 conversation?

21 A. She was in the room, yes.

22 Q. Okay. Did she say anything during that
23 conversation?

24 A. I don't recall.

25 MS. CONNOR: I don't have any other

JAMES EDWARD NACE

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1 questions. Thank you.

2 * * *

3 EXAMINATION

4 BY MR. SANTARONE:

5 Q. Mr. Nace, you talked about the fall
6 tournament in Lycoming. Did your daughter play in
7 that?

8 A. Yes.

9 Q. Did you go to that tournament?

10 A. Yes.

11 Q. And where did that take place?

12 A. It was out around Altoona.

13 Q. And was it something you had to stay
14 overnight a couple days?

15 A. Yes.

16 Q. You first -- you and your wife first
17 confronted your daughter on September 26th. Is that
18 what you said?

19 A. Yes.

20 Q. And what day was it that she admitted that
21 she was involved in a physical relationship with Mr.
22 Romig?

23 A. The same day.

24 Q. That same day, the 26th?

25 A. Yes. Yes.

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1 Q. And you went to the police what day?

2 A. The 26th.

3 Q. After -- before you spoke to your daughter?

4 A. Yes.

5 Q. And when she acknowledged this relationship,

6 how long did that total meeting between you, your

7 wife and your daughter last?

8 A. I don't recall.

9 Q. Was your daughter crying?

10 A. Yes.

11 Q. Was your daughter -- what was your

12 daughter's demeanor? Was she angry because this

13 relationship was going to be broken up or did she

14 seem relieved that you found out about it?

15 A. I'd say she was probably angry.

16 Q. She was angry?

17 A. (Witness nods head.)

18 Q. Did she tell about her personal feelings for

19 Mr. Romig?

20 A. Yes.

21 Q. What did she say?

22 A. She said she loved him.

23 Q. And I was confused because you talked about

24 how many times then after that you spoke to your

25 daughter about the Romig relationship and I thought

JAMES EDWARD NACE

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1 you said you spoke to her just that one time.

2 A. Just the one time, yes.

3 Q. That night we're talking about?

4 A. Yes.

5 Q. And after you -- what happened then after
6 that conversation came to an end, the three of spoke?

7 A. In what regards?

8 Q. Did she go into her room and lock herself in
9 her room or --

10 A. I don't recall.

11 Q. Okay. Do you recall whether the three of
12 you spent the night in the same bed, you, your wife
13 and your daughter?

14 A. Yes, we did.

15 Q. How long did that last? For how many
16 nights?

17 A. If I remember correctly, maybe a week.

18 Q. I thought you said she was angry at you,
19 though?

20 A. No. I said she was angry about the
21 situation.

22 Q. She wasn't angry about you finding out about
23 the relationship and the fact that she wouldn't see
24 Mr. Romig any more?

25 A. I don't know.

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1 Q. You talked about the overnight trips with
2 the Belles and that Mr. Romig wasn't there. These
3 overnight trips that you went on were after Mr. Romig
4 had been arrested?

5 A. Yes.

6 Q. And how many of those were there, do you
7 remember?

8 A. I do not.

9 Q. You went to -- did you ever -- when she was
10 younger before she got good, did you coach her ever?

11 A. Yes.

12 Q. And what years did you coach?

13 A. Oh, wow. I coached her on and off from
14 probably the time she was nine or ten to 16.

15 Q. Okay. And you obviously -- we talked about
16 these overnight trips you're going on, you went on
17 and you still went on and still going on. Did you
18 miss any games after -- in her junior or senior year?

19 A. Yes.

20 Q. And how many games did you miss her junior,
21 senior year?

22 A. Most of them.

23 Q. But you went enough to know what her playing
24 time was because you said you saw a change in her
25 playing time. So you did go to some games, correct?

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1 A. Yes.

2 Q. What difference did you see in her playing
3 time?

4 A. She didn't play nearly as much.

5 Q. And how many games was it that you went to
6 that you saw this pattern that you could say, oh,
7 she's not playing as much as she used to?

8 A. I don't recall.

9 Q. How many games are in a season?

10 A. I'm not even sure for school. Twelve maybe,
11 14. I don't know.

12 Q. Okay. Did you -- at the time that you saw
13 that her playing had decreased, who was the coach of
14 the team then?

15 A. It was Coach Koehler.

16 Q. Did you talk to Coach Koehler at all about
17 your daughter's playing time?

18 A. No.

19 Q. And how long did that decrease in the
20 playing time, how long did that last, that you saw?

21 A. Both years.

22 Q. Both her junior and her senior year?

23 A. Yes.

24 Q. There would be box scores of the games that
25 showed how much she played, right?

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1 A. Probably not with him. He didn't give a lot
2 of box scores.

3 Q. In a high school team, they didn't have
4 somebody who was keeping box, keeping score?

5 A. The girls, I believe, kept score on the
6 team.

7 Q. When you talked about a decrease in her
8 playing time, was she not starting or was she
9 starting and being taken out of the game?

10 A. Both.

11 Q. And she was a pitcher?

12 A. Yes.

13 Q. And a pitcher wouldn't start every game,
14 right?

15 A. Yes, they do in softball.

16 Q. They do in softball?

17 A. Yes.

18 Q. How many pitchers were on the team in her
19 junior year?

20 A. I believe three, counting her.

21 Q. Okay. And in her sophomore year, was she
22 the primary pitcher? Did she start most of her
23 games?

24 A. Her sophomore year?

25 Q. Her 10th grade year.

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1 A. Yes.

2 Q. And 11th grade that changed?

3 A. Yes.

4 Q. This scholarship that she has at Lycoming,
5 is that a full scholarship or do you and your wife
6 have to pay something or does Liz have to take out
7 loans?

8 A. Yes, we have to pay loans.

9 Q. How much is the difference above what her
10 scholarship is? Do you know -- is the scholarship 75
11 percent of the ride? Do you know that?

12 A. I do not.

13 Q. Do you know how much you pay every year?

14 A. I do not.

15 Q. You were asked a question about whether or
16 not -- do you know whether she's getting any
17 mental -- you were asked do you know whether she's
18 getting mental health treatment at Lycoming and you
19 said no. Is that, no, she's not getting or, no, you
20 don't know?

21 A. She's not getting any at Lycoming.

22 Q. You were asked that same question about you
23 and your wife, you haven't had mental health
24 treatment as a result of what happened between your
25 daughter and Mr. Romig?

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1 A. No.

2 Q. Has your wife had any mental health
3 treatment?

4 A. Not that I'm aware of, no.

5 Q. You said that after that first night, you
6 didn't speak -- you and Liz haven't talked about what
7 happened at all. Have you and your wife talked about
8 what happened?

9 A. Yes.

10 Q. And other than when you went to the police
11 department or you met with your attorney, have you
12 talked about it other than that?

13 A. Yes.

14 Q. And what discussions have you had with your
15 wife?

16 A. Well, just basically about what's going on
17 as far as how Liz is doing and how we're doing
18 together.

19 Q. And what have you heard from any source
20 about -- from your wife or any other source about
21 what's a negative in how Liz is doing? Anything?

22 A. Now?

23 Q. No. From the time you've talked about it
24 since that first night until now.

25 A. Well, I know she was losing weight for a

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1 while. She had a pretty bad skin condition. Said
2 she didn't like being left alone. She was very
3 clingy. She was tired at times, not as energetic as
4 she used to be. She's a pretty energetic kid
5 normally.

6 Q. And how long did that last that she didn't
7 seem as energetic?

8 A. I think it's still that way.

9 Q. And how long was it that she said she was
10 clingy?

11 A. Still that way.

12 Q. Was there any discussion about her not going
13 away to college, to go into a local college and
14 living at home?

15 A. No.

16 Q. Why not?

17 A. She didn't want to.

18 Q. She wanted to go away to college?

19 A. Yes.

20 Q. The question -- you talked about the losing
21 weight and the skin condition. They were both
22 conditions that existed before the start of her --
23 before the fall of 2013, correct?

24 A. The weight loss I believe was. I'm not sure
25 about the skin condition as far as time.

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1 Q. And what did you know before the fall of
2 2013 about the weight loss? What was the issue
3 there?

4 A. Just that she was -- I found out later that
5 she was not eating properly. I didn't really know
6 about it. She's always been small.

7 Q. Do you know -- do you know roughly what her
8 weight is?

9 A. Now? 105.

10 Q. And do you know whether she -- before the
11 relationship with Eric Romig, whether or not she had
12 sought any counseling regarding any eating disorders
13 or her weight loss?

14 A. No.

15 Q. Do you know whether after -- since the
16 incident with Eric Romig she sought any counseling or
17 treatment for weight loss or eating disorders?

18 A. No.

19 Q. No, you don't know or, no, she hasn't?

20 A. I don't know.

21 Q. But not to your knowledge?

22 A. Not to my knowledge, no.

23 MR. SANTARONE: That's all I have.

24 Thank you.

25 * * *

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EXAMINATION

2 BY MR. COX:

3 Q. Mr. Nace, my name is Rob Cox and I represent
4 Pennridge School District and Tom Creeden and David
5 Babb. And I have just a few questions for you. I'm
6 going to try to not cover areas that you've already
7 covered with the other attorneys here, but there may
8 be some overlap.

9 I'm also going to ask you some questions
10 about what you know about the case. And I just want
11 to remind you, I'm not asking you for information
12 about this case or the facts of this case that you've
13 heard from your attorney. I just want to know about
14 information that you have independent of your
15 conversations with Mr. Groth and his colleagues.

16 Can you tell me, please, what your
17 opinion of Eric Romig was as a coach prior to
18 September 26th when you learned about the
19 relationship?

20 A. Seemed like a good coach.

21 Q. And why do you say that? What about him?

22 A. He had knowledge of the game. He did the
23 e-mailing very well as far as what was going on with
24 the players and practices. And basically he had
25 knowledge of the game, it seemed.

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1 Q. How was he with -- when you say he was good
2 about e-mailing, what do you mean by that?

3 A. Well, coaches send out e-mails as far as, I
4 guess, schedules or whatever.

5 Q. So he kept you in the loop?

6 A. Yes.

7 Q. Basically. All right. What else
8 contributed to your assessment of him as a good
9 coach, if anything?

10 A. That's probably about it.

11 Q. Did you -- when did you interact with him?
12 Like what was the context of your interactions with
13 him typically when Liz was playing softball for the
14 Belles and for Pennridge?

15 A. Typically I didn't have any interactions
16 with him. I worked with him one time at a practice
17 that he had called that a couple kids came over for,
18 me and a couple of my buddies, because we all
19 coached.

20 And interacted, talked to him for maybe a
21 minute or two at the picnic that he had had for the
22 team and that was about it.

23 Q. And was there anything unusual about those
24 interactions with him?

25 A. No.

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1 Q. What was your impression of him as a result
2 of those interactions?

3 A. I don't know. Didn't really have an
4 impression of him for that.

5 Q. Did you perceive him as a threat or
6 dangerous in any way?

7 A. No.

8 Q. Did those interactions occur in Liz's 9th
9 and 10th grade years at Pennridge? When did they
10 occur? Is it fair to say they were during her 9th
11 and 10th grade years?

12 A. Yes.

13 Q. Do you have any reason to believe anyone at
14 Pennridge had knowledge of the relationship between
15 Romig and Liz prior to his arrest?

16 A. No.

17 Q. Do you have any knowledge about a
18 conversation between David Babb and Russell
19 Hollenbach about Mr. Romig?

20 MR. GROTH: Other than --

21 Q. Again, other and what you've learned from
22 your attorneys.

23 A. No.

24 Q. Did anyone at Pennridge other than Mr. Romig
25 ever treat Liz inappropriately during her career

JAMES EDWARD NACE

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1 there?

2 A. No.

3 Q. How about including after Mr. Romig's
4 arrest, did anyone ever treat her inappropriately at
5 Pennridge?

6 A. No.

7 Q. Are you aware that any other students
8 treated her inappropriately or bullied her while she
9 was at Pennridge?

10 A. No.

11 Q. How about members of the staff other than
12 Mr. Romig?

13 A. No.

14 Q. Did you have any interaction with Tom
15 Creedon while Liz was at Pennridge?

16 A. No.

17 Q. Do you know who he is?

18 A. I believe he was the principal.

19 Q. All right. Do you have any reason to
20 believe that he acted inappropriately at any point
21 while Liz was at Pennridge?

22 MR. GROTH: Other than through
23 discussions with counsel.

24 A. No.

25 Q. Do you know who David Babb is?

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1 A. Yes.

2 Q. And how do you know him?

3 A. I don't know him personally. I know --

4 Q. How do you know --

5 A. -- he's athletic director.

6 Q. I'm sorry I cut you off. How do you know of

7 David Babb?

8 A. I believe he's the athletic director.

9 Q. To your knowledge, did he ever act

10 inappropriate in any way while Liz was at Pennridge?

11 A. No.

12 Q. And you mentioned Paul Koehler during your

13 testimony. He was Liz's head coach when she was a

14 varsity player, correct?

15 A. Correct, yes.

16 Q. So that would have been her junior and

17 senior years?

18 A. Yes.

19 Q. All right. And Romig was her head coach

20 while she was on the 9th and 10th grade teams, on the

21 JV teams. Is that correct?

22 A. Yes.

23 Q. What was your impression of Paul Koehler as

24 a coach?

25 A. Horrible.

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1 Q. Why do you say that?

2 A. Not a good coach and not a good man.

3 Q. Why do you say he's not a good man?

4 A. Didn't treat the girls with respect.

5 Q. Can you expand on that? In what way did he
6 not treat the kids with respect?

7 A. Mainly his comments towards girls, what you
8 would say in front of the other players to a player.
9 Just not the way I coached a team. Not --

10 Q. What kinds of things would he say?

11 A. Just little digs, constant, you know, berate
12 somebody for making an error.

13 Q. So they were comments that related to their
14 performance?

15 A. Yes.

16 Q. Did he make sexually explicit or
17 inappropriate comments to the girls?

18 A. No.

19 Q. Why do you say he's a -- you said he was a
20 bad coach and a bad man, I think.

21 MR. RUSSELL: Not a good man.

22 Q. Not a good man. Tell me how you reached
23 those assessments of him.

24 A. Well, I've been around the game of softball
25 for about 38 years and that's just my opinion.

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1 Q. I understand why you believe he wasn't a
2 good coach because of comments he made and the way he
3 criticized the performance of his players, right?
4 That was what you took issue with?

5 A. Yes.

6 Q. Why do you assess him as not a good man?

7 A. Same reason.

8 Q. Because of his -- the way he coaches?

9 A. You don't treat kids like that.

10 Q. Did you ever -- did you take issue with
11 anything that Mr. Koehler did specifically with Liz?

12 A. No.

13 Q. Was he ever inappropriate to her
14 specifically?

15 A. No.

16 MR. GROTH: Inappropriate in a
17 critical way or --

18 Q. In any way.

19 A. No.

20 Q. You mentioned that you noticed that she had
21 a decrease in her playing time in her junior year.

22 Did I understand that correctly?

23 A. Yes.

24 Q. Did that decrease in playing time occur
25 after she moved from junior varsity to the varsity

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1 team?

2 A. Yes.

3 Q. Was that in your view the reason that her
4 playing time decreased or one of the reasons that her
5 playing time decreased?

6 A. Yes.

7 Q. Did you interact with Pennridge -- with
8 anyone at Pennridge after Mr. Romig's arrest?

9 A. No.

10 Q. Did you speak to any of Liz's teachers?

11 A. No.

12 Q. How about her guidance counselors?

13 A. No.

14 Q. I think you already testified that you did
15 not speak to Principal Creeden. Is that true, as
16 well? After Romig's arrest, you didn't speak to
17 Creeden about the situation?

18 A. Correct.

19 Q. How about Babb?

20 A. No.

21 Q. Were there softball team banquets after
22 Liz's 9th -- was there a softball banquet after Liz's
23 9th grade season, do you recall?

24 A. Yes, I believe so.

25 Q. Did you attend that banquet?

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1 A. No.

2 Q. How about after her 10th grade season, was
3 there a banquet?

4 A. Yes.

5 Q. Did you attend that banquet?

6 A. No.

7 Q. Mr. Russell, I think, asked you a question
8 about whether sitting here now you think you should
9 have done anything differently. Do you remember that
10 question?

11 A. Yes.

12 Q. And you said no to that.

13 Sitting here now, what should Pennridge
14 or someone at Pennridge have done differently?

15 MR. GROTH: Object to the form
16 insofar as it asks for some legal opinion or
17 expertise.

18 But, otherwise, you can answer.

19 A. I don't know.

20 Q. Do you have -- do you have any problem with
21 the way the Pennridge administration handled things
22 with Liz after Mr. Romig's arrest?

23 A. No.

24 MR. COX: Mr. Nace, that's all I
25 have. Thank you.

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1 MR. KEMETHER: Couple of quick
2 follow ups.

3 * * *

4 EXAMINATION

5 BY MR. KEMETHER:

6 Q. I just want to make sure I'm clear. You had
7 a lot of questions about the loss of playing time
8 junior, senior year. Are you in any way attributing
9 this to the Eric Romig situation?

10 A. No.

11 Q. Have you or your wife spent any money out of
12 pocket relating to anything pertaining to the Eric
13 Romig situation, medical treatment, anything at all?

14 A. I don't know.

15 Q. During the summer of 2013, did you or your
16 wife check your daughter's cell phone on any basis at
17 all to see what sort of texts or e-mails were going
18 on?

19 A. I did not, no.

20 Q. Do you know if your wife did?

21 A. I do not know.

22 Q. And the last question I have. Do you and
23 your wife live together?

24 A. Yes.

25 MR. KEMETHER: Thank you very much.

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EXAMINATION

3 BY MR. RUSSELL:

4 Q. I just have a couple, as well. You
5 indicated that Mr. Koehler was not a good coach and
6 not a good man. At least outwardly, was Mr. Romig a
7 good coach and appeared to be a good man?

8 A. Yes.

9 Q. And back to the Belles issue. Who's the
10 coach of the Belles at the time that you made the
11 report to -- other than Mr. Romig, who was the other
12 coach? Who were the other coaches?

13 A. There was two teams.

14 Q. Two Belles teams?

15 A. Yes.

16 Q. And your daughter was on both teams?

17 A. No. Well -- well, no.

18 Q. Was it like an A and a B team or something?

19 A. Yes.

20 Q. And was she -- which team was she on?

21 A. The B team.

22 Q. And then sometimes they would call her up as
23 a guest player or something on the A team?

24 A. I don't think that happened. I think they
25 did on occasion with some kids.

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1 Q. Who else was on -- who was the other coach
2 of the B team, if there was one?

3 A. I do not recall.

4 Q. Do you know any of the people personally
5 that are on the Belles in the administration and
6 coaching?

7 A. No.

8 Q. And were any of the coaches from the Belles,
9 were they also coaches at Pennridge?

10 A. Yes.

11 Q. Which --

12 A. On the gold team.

13 Q. What was the nomenclature for the non-gold
14 team? Was it the silver team?

15 A. Possibly.

16 Q. They have silver Belles and gold Belles, I
17 guess, maybe. Would that be accurate?

18 A. Yes.

19 Q. But on the gold Belles, the coach of that,
20 was that Koehler?

21 A. Yes.

22 Q. So he was also the coach -- the varsity
23 coach at Pennridge?

24 A. Yes.

25 MR. RUSSELL: I have no further

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1 questions.

2 MS. CONNOR: No.

3 MR. SANTARONE: No.

4 MR. KEMETHER: Thank you, sir.

5 (Concluded at 2:40 p.m.)

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, 2015

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I hereby certify that the evidence
and proceedings are contained fully and accurately in
the notes taken by me of the testimony of the within
witness who was duly sworn by me, and that this is a
correct transcript of the same.

12

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Stacy D. Serba

Stacy D. Serba

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Notary Public

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18

The foregoing certification does not apply to any
reproduction of the same by any means unless under
the direct control and/or supervision of the
certifying reporter.

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Honorable Judge:

I am writing you this statement, because my daughter is a victim of a sexual crime committed by her softball coach, Eric Roemig. It is difficult for me to even say his name with the hatred I have towards this man, for what he has done to our child. I never thought I could feel this way toward another human being.

It's hard for me to put into words how I am feeling, other than shocked, disgusted, sickened, deceived, and hatred. There aren't enough words to describe it. This is a person that we, and a lot of people I have known for years, trusted with our children on a daily basis to teach them the game, and to protect them on and off the field if necessary. He took that trust and used it to satisfy his perverted needs. He used that trust against our daughter, told her what she wanted to hear, so she would be comfortable around him, and then took full advantage of her.

My daughter and I have spent a lot of quality time together on a softball field for the past 10 years. It was "our thing" Now I am having a very difficult time even going to watch her play. Our friends have been very supportive, but I still feel uncomfortable around them knowing what this man did to her.

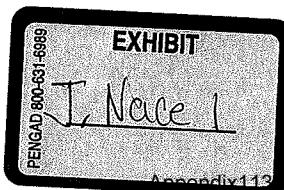
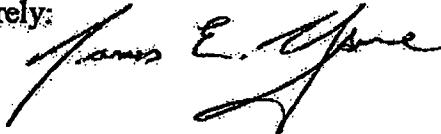
When we first became aware of this on Sept 29th, 2013 I was in total shock! Its something I never expected. He took something from our daughter that she can never get back. I pray every night that she can get past this, and live a somewhat normal life. She deserves that, she is a great kid!

We are aware that this is not the first time the defendant has acted in an inappropriate manner with children, and I can guarantee it won't be the last. People like him don't change, he's already proven that. When he gets released, it's only a matter of time that he strikes again. I am hoping you will give him the maximum sentence that the law will allow.

He is a true predator, He knew exactly what he was doing.

Thank You

Sincerely:



A	B	C	D
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